

EXHIBIT 5B

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

MICHAEL JENKINS, et al.,
Plaintiffs,
v. Civil Action No. 3:23-cv-374-DPJ-ASH
RANKIN COUNTY, MISSISSIPPI, et al.,
Defendants.

REMOTE VIDEOTAPED DEPOSITION OF

JEFFREY MIDDLETON

TAKEN ON

FRIDAY, MARCH 14, 2025

10:07 A.M.

FCI MCKEAN

6975 PA-59

LEWIS RUN, PENNSYLVANIA 16738

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106 to 109

<p style="text-align: right;">Page 106</p> <p>1 I gave one to our -- to Brett. I gave one to our 2 legal counsel. 3 Q. Your legal counsel at that time was Paul 4 Holland? 5 A. Correct. 6 Q. Great. Thank you. 7 Or was he undersheriff then? 8 A. He was the legal counsel. 9 Q. Okay. 10 A. And I can't remember exactly but I may 11 have given one to the undersheriff, which was Randy 12 Gray. I'm not 100 percent about that. So that's -- 13 I'm not sure. 14 Q. Do you know if you gave one to Dwayne 15 Thornton? 16 A. I was thinking about that one, too, and I 17 can't remember for sure if I did. I want to say 18 that I possibly did but I'm not -- I'm not sure. 19 Q. I may have asked this earlier. Were you 20 part of the WhatsApp messages that were published in 21 the USA Today and New York Times, those messages 22 where people were discussing taking pictures with 23 dead bodies and getting points for shooting people? 24 A. What group was that? Do you know the name 25 of the group?</p>	<p style="text-align: right;">Page 108</p> <p>1 Brett was in narcotics and a few times that I went 2 with him he would always get them to sign a consent 3 to search form, the homeowner. And at that time it 4 was to the best of my knowledge legal to search at 5 that time. I mean, but you could -- you could back 6 it up even further and get a search warrant, 7 obviously. But -- 8 Q. Would he go knock and talk, and say, hey, 9 sign this consent to search form giving us consent 10 to search your house? 11 A. Asking them. Right. 12 Q. Asking. Well, you don't think that there 13 wouldn't be a certain amount of intimidation 14 involved in that? 15 MR. DARE: Object to form. 16 THE WITNESS: I'm not sure. 17 BY MR. WALKER: 18 Q. I mean, here I am. I want to search your 19 house. Here, sign this. But I don't have a warrant 20 but it's okay if you sign this. You don't think 21 that a certain percentage of citizens would see that 22 they didn't have a choice but to sign a consent to 23 search? 24 MR. DARE: Objection. Argumentative. 25 THE WITNESS: That's not anything that I</p>
<p style="text-align: right;">Page 107</p> <p>1 Q. No. I just know that it was a WhatsApp 2 group within the Sheriff's Department. 3 A. I can honestly say for 100 percent that I 4 was not because I do not recall ever hearing anybody 5 getting points for shooting somebody. You know, but 6 again, like with those -- the reason I say that I 7 can't recall or that I can't say that I never was is 8 the same like I said earlier. Like sometimes those 9 messages would be so mean that I would never just 10 read them. I would never go back and read all 11 those. There were a bunch of messages that I know 12 I've missed. 13 Q. In your experience as a member of the 14 Rankin County Sheriff's Department, have you 15 experienced other deputies participating in 16 warrantless raids or searches? 17 A. Illegally? 18 Q. Yes. 19 A. No. 20 Q. Okay. We discussed earlier about knocks 21 and talks and those not necessarily being raids that 22 a warrant would exit for. 23 A. Right. 24 Q. Do you think that that's legal? 25 A. There are times that I went, like when</p>	<p style="text-align: right;">Page 109</p> <p>1 could answer. I mean, we don't just go up there and 2 say, hey, sign this. I mean, like hey, ma'am, sir, 3 we got a call about you all selling drugs out of 4 this house. We're over here investigating that. Do 5 you -- what do you say about that? Oh, we're not 6 selling drugs. Oh, well, do you mind if we walk 7 around and search your house to see? And they're 8 like, sure, you can. So you say, would you mind 9 signing this? I mean, I don't know if that's the 10 exact wording but never have I seen anybody be 11 intimidated to sign something. 12 Q. Okay. The situation you're describing, if 13 you have criminal reason to believe drug sales are 14 occurring at a particular residence, that's 15 precisely when you go get a warrant. 16 A. If you only have -- if you -- what you 17 said, good evidence saying that they are, this may 18 just be a neighbor calling. And this is just the 19 beginning of the investigation of it that you go 20 over there and do that. Not that you've done 21 surveillance on the house and seen people. Just 22 going off of a neighbor. And because that -- those 23 kind of -- those people call all the time saying 24 that my neighbor is selling drugs and we don't run 25 and get a search warrant every time. They -- this</p>

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1 is what I've been involved with a few times. It's
 2 like they go over there and they investigate it.
 3 They, you know, we got a call about this happening.
 4 And we can -- there's nothing going on. We take a
 5 quick look around your house and leave. Get out of
 6 your hair. I mean, but now if your investigation
 7 would go further and you did surveillance and you've
 8 seen all this then that would be -- definitely be a
 9 reason that you would get a search warrant.
 10 Q. Okay. In your experience at the Sheriff's
 11 Department, had you ever, before January 24, 2023,
 12 saw members of the Sheriff's Department use any sort
 13 of sex toys as a humiliation tactic against people
 14 who were arrested or detained?
 15 A. No.
 16 Q. Okay. Had you ever seen the use of sex
 17 itself as a humiliation tactic --
 18 A. No.
 19 Q. -- against people who were arrested or
 20 detained?
 21 A. No.
 22 Q. Before that night, January 24th, when
 23 Christian Dedmon discharged his firearm as we know
 24 he also did in December with Alan Schmidt on the
 25 side of I-20, had you ever experienced or heard

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1 about deputies discharging firearms as a means of
 2 intimidation or of extracting confessions or
 3 information from people who were detained or
 4 arrested?
 5 A. No.
 6 Q. Before January 24, 2023, had you ever
 7 experienced or witnessed theft or confiscation of
 8 private surveillance equipment to cover up any
 9 illegal activities of the Rankin County Sheriff's
 10 Department?
 11 A. No.
 12 Q. You stated earlier that you had a .38 in
 13 your possession that you offered to Elward. Had you
 14 observed other people in the Sheriff's Department
 15 who had guns that were not registered to them in
 16 their possession for the purpose of using if a stop
 17 went bad?
 18 A. No.
 19 Q. Have you ever observed the use of
 20 intimidation to prevent the reporting of excessive
 21 force?
 22 A. Ask that again. I'm sorry.
 23 Q. Have you ever observed anybody in the
 24 Sheriff's Department use intimidation to prevent
 25 excessive force from being reported?

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1 A. No.
 2 Q. Had you ever experienced excessive Taser
 3 usage or gratuitous Taser usage on people who were
 4 detained or arrested?
 5 A. No.
 6 Q. As shift lieutenant, what role did you
 7 play in ensuring or examining or making sure that
 8 Tasers were properly used?
 9 A. That would fall more on my sergeant
 10 because the sergeant runs the day-to-day operations,
 11 like if it was a use of force report, if we were
 12 just using, for example, Hunter Elward, if he'd tase
 13 somebody, well, then he would have to do a use of
 14 force report and make sure that his Taser got
 15 downloaded and the sergeant would make sure that
 16 those things got done. And then the sergeant would
 17 sign off on the use of force report. Unless the
 18 sergeant was not available, and then I would do it.
 19 Q. But there was a procedure in place that
 20 was supposed to be followed?
 21 A. On the use of the Taser?
 22 Q. Yes.
 23 A. Yes.
 24 Q. And use for discharge of firearms, there
 25 was also a procedure in place then also?

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1 A. Correct. Yes.
 2 Q. Okay. So to use Mr. Dedmon as an example,
 3 if he discharged his firearm for any reason other
 4 than target practice, that's supposed to be
 5 reported. Correct?
 6 A. Correct.
 7 Q. All right. So if he chose not to report
 8 it then what procedure was in place to be able to
 9 account for a discharge?
 10 A. I don't think that there was a procedure
 11 in place like to, you know, if he chose not to
 12 report it. I did not think there was a procedure in
 13 place for that.
 14 Q. All right. The department issued
 15 ammunition?
 16 A. Correct.
 17 Q. But the department didn't have a procedure
 18 to count ammunition used?
 19 A. To my knowledge, no.
 20 Q. Have you ever seen anybody waterboarded by
 21 members of the Sheriff's Department before the night
 22 of January 24, 2023?
 23 A. No.
 24 Q. Before the night of January 24, 2023, at
 25 Conerly Road, had you ever observe any member of the

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<p style="text-align: right;">Page 114</p> <p>1 department to insert a gun into the mouth of a</p> <p>2 person who has been arrested or detained?</p> <p>3 A. No.</p> <p>4 Q. Before that night on Conerly Road, had you</p> <p>5 ever observed any member of the department</p> <p>6 withholding medical treatment from someone who was</p> <p>7 arrested and detained?</p> <p>8 A. No.</p> <p>9 Q. Did you fill out a use of force report</p> <p>10 every time you use force?</p> <p>11 A. Yes.</p> <p>12 Q. Who did you report to within the</p> <p>13 department?</p> <p>14 A. Dwayne Thornton.</p> <p>15 Q. And you were the shift sergeant so Dwayne</p> <p>16 was -- or Officer Thornton he was what?</p> <p>17 A. Chief deputy.</p> <p>18 Q. Chief deputy. Okay. And he was your</p> <p>19 direct report?</p> <p>20 A. Yes.</p> <p>21 Q. So any issues you had you reported to Mr.</p> <p>22 Thornton?</p> <p>23 A. Yes.</p> <p>24 Q. All right. Did you share with Mr.</p> <p>25 Thornton that you really had some issues with the</p>	<p style="text-align: right;">Page 116</p> <p>1 Deputy Chief Nolan (phonetic)?</p> <p>2 A. Sometimes he would even do it on a radio.</p> <p>3 Like he would just key up on a radio and ask what</p> <p>4 supervisor is working and then he would just tell me</p> <p>5 over the radio to get some people to, you know, go</p> <p>6 take care of whatever situation.</p> <p>7 Q. We talked a second ago about Paul Holley,</p> <p>8 who went from legal counsel to undersheriff at one</p> <p>9 point. He was reserve deputy?</p> <p>10 A. Yes.</p> <p>11 Q. And at some point do you know if he was</p> <p>12 assistant county prosecutor?</p> <p>13 A. Yes. I think he was. That's right.</p> <p>14 Yeah.</p> <p>15 Q. Okay. Are you aware of any instance where</p> <p>16 he might have participated in a raid and then</p> <p>17 prosecuted the defendants that resulted from that</p> <p>18 raid?</p> <p>19 A. No.</p> <p>20 Q. Have you ever observed Bryan Bailey use</p> <p>21 excessive force against anybody who was arrested or</p> <p>22 detained?</p> <p>23 A. Not that I can think of.</p> <p>24 Q. Okay. Do you know if the -- and I'm going</p> <p>25 back to this challenge coin -- do you know if the</p>
<p style="text-align: right;">Page 115</p> <p>1 way that Mr. Dedmon carried himself?</p> <p>2 A. I'm trying to remember if we had a</p> <p>3 specific conversation about it. I can't recall on</p> <p>4 that. I can't --</p> <p>5 Q. You may or may not have?</p> <p>6 A. May or may not have.</p> <p>7 Q. What kind of day-to-day interaction did</p> <p>8 you have with Sheriff Bailey?</p> <p>9 A. Really nothing.</p> <p>10 Q. Okay. Under what circumstances did you</p> <p>11 interact with Sheriff Bailey?</p> <p>12 A. If he needed to, like I said, sometimes he</p> <p>13 would get like Thornton to -- they'd have so-and-so</p> <p>14 take care of this. Like speeders. I keep using</p> <p>15 that for example in a neighborhood. And then Chief</p> <p>16 Thornton would text me or whatever or call me. Like</p> <p>17 they have so many guys go to the neighborhood. And</p> <p>18 then sometimes Sheriff Bailey would call me or text</p> <p>19 me himself. And any -- any relationship that I've</p> <p>20 ever had, or if you want to call it a relationship,</p> <p>21 interactions, it would just 100 percent like work</p> <p>22 related, like he would call me and tell me to do --</p> <p>23 get this taken care or to take care of that. But</p> <p>24 it's very rare that he calls or texts me himself.</p> <p>25 Q. Okay. So he would mostly go through</p>	<p style="text-align: right;">Page 117</p> <p>1 existence of that Goon Squad logo was well known to</p> <p>2 personnel at all levels of the Sheriff's Department,</p> <p>3 including Sheriff Bailey?</p> <p>4 MR. DARE: Object to form.</p> <p>5 THE WITNESS: You know what? Ask the --</p> <p>6 ask me again I'm sorry.</p> <p>7 BY MR. WALKER:</p> <p>8 Q. Do you know if the existence of the Goon</p> <p>9 Squad logo was well known to personnel at all levels</p> <p>10 of the Sheriff's Department up to and including</p> <p>11 Sheriff Bailey?</p> <p>12 A. I do not.</p> <p>13 Q. You don't know?</p> <p>14 A. I do not.</p> <p>15 Q. Okay. Is it a fair statement that as a</p> <p>16 matter of routine you're not closely supervised by</p> <p>17 Sheriff Bailey?</p> <p>18 A. Yes. That's correct.</p> <p>19 Q. All right. Is it true as a matter of</p> <p>20 routine you are not closely supervised by Chief</p> <p>21 Deputy Thornton?</p> <p>22 A. Correct.</p> <p>23 Q. Is it a fair statement that as a matter of</p> <p>24 routine you and other members of the Rankin County</p> <p>25 Sheriff's Department were pretty much left to your</p>

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<p style="text-align: right;">Page 118</p> <p>1 own devices as long as crime was kept in check?</p> <p>2 A. And yes. As long as we weren't getting</p> <p>3 complaints.</p> <p>4 Q. Okay. Is it a fair statement that you and</p> <p>5 the other members of the Sheriff's Department were</p> <p>6 free to use whatever force you deemed necessary to</p> <p>7 maintain law and order?</p> <p>8 A. No.</p> <p>9 Q. Okay. How were tabs kept on the force</p> <p>10 that you used other than use of force reports and</p> <p>11 Taser downloads?</p> <p>12 A. Just by the sergeant going to calls with</p> <p>13 the deputies and occasionally, I go. Mostly, it's</p> <p>14 going to be a more -- like if it was a death or</p> <p>15 whether it was just a motor vehicle accident death</p> <p>16 or somebody was killed or, you know, a life was</p> <p>17 lost, then I would go just to make sure that all the</p> <p>18 procedures happened the way that they were supposed</p> <p>19 to happen. You know, like the crime scene didn't</p> <p>20 get contaminated or anything So there's that.</p> <p>21 Q. Okay. But even in that instance you've</p> <p>22 got concerns about the activities of Christian</p> <p>23 Dedmon.</p> <p>24 A. I don't understand.</p> <p>25 Q. Well, my question was that whether you and</p>	<p style="text-align: right;">Page 120</p> <p>1 road December 2020?</p> <p>2 A. Yes.</p> <p>3 Q. Which also incidentally involved two</p> <p>4 people who were directly under your charge, Mr.</p> <p>5 Elward and Mr. Opdyke.</p> <p>6 A. And one more. Stephan Williams.</p> <p>7 Q. And Stefan Williams. Okay. And you said</p> <p>8 somebody named Sanford?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. Were Mr. Williams and Mr. Sanford</p> <p>11 under your charge?</p> <p>12 A. Williams was. Sanford, yeah, Sanford was.</p> <p>13 Not routinely. He was from another shift and worked</p> <p>14 overtime --</p> <p>15 Q. Oh, okay.</p> <p>16 A. -- on my shift, so yes, he was.</p> <p>17 Q. He was. To the extent he was on your</p> <p>18 shift --</p> <p>19 A. That's what happened that night. Yes.</p> <p>20 Q. Okay. Did anybody at all tell you</p> <p>21 anything regarding there being an arrest of Mr.</p> <p>22 Schmidt?</p> <p>23 A. No.</p> <p>24 Q. Okay. And it seems like about half your</p> <p>25 shift was there.</p>
<p style="text-align: right;">Page 119</p> <p>1 other members of the Sheriff's Department were free</p> <p>2 to use whatever force you deemed necessary in order</p> <p>3 to maintain law and order. You just gave me the</p> <p>4 answer that you gave. But earlier in the deposition</p> <p>5 you said that you, yourself, were concerned about</p> <p>6 Christian Dedmon, the way he carried himself.</p> <p>7 A. Okay.</p> <p>8 Q. But as close as you could tell, were any</p> <p>9 reins ever put on him?</p> <p>10 A. As close as I could tell, no.</p> <p>11 Q. Is it true or false that the members of</p> <p>12 the Sheriff's Department routinely faced no</p> <p>13 accountability for the use of excessive force or</p> <p>14 injuries to detainees or arrestees?</p> <p>15 A. I'm not aware of any excessive force other</p> <p>16 than what we know about here and have been reported.</p> <p>17 So that answer would be no because I don't of any --</p> <p>18 like, hey, this guy had excessive force put on him</p> <p>19 and nothing was done about it.</p> <p>20 Q. And when you say what we know and what's</p> <p>21 been reported, you're talking specifically about</p> <p>22 probably with Mr. Jenkins and Mr. Parker. Yes?</p> <p>23 A. Yes.</p> <p>24 Q. All right. And you're also talking about</p> <p>25 Alan Schmidt and what occurred on the side of the</p>	<p style="text-align: right;">Page 121</p> <p>1 A. Four of the nine. Yes. Yes.</p> <p>2 Q. And the nine that you said earlier</p> <p>3 included you?</p> <p>4 A. Right.</p> <p>5 Q. So at your shift, this involved Alan</p> <p>6 Schmidt, who also guilty pleas have been entered</p> <p>7 involving Mr. Elward and Mr. Opdyke, as well as</p> <p>8 Christian Dedmon, and nobody ever told you that they</p> <p>9 were ever on the side of I-20?</p> <p>10 A. Not until all this other stuff started</p> <p>11 coming up is when I found out about that. The</p> <p>12 hearsay of the phone call that I told you about that</p> <p>13 the guy called from the jail --</p> <p>14 Q. And called his mother and his grandmother?</p> <p>15 A. Somebody. And I don't remember who even</p> <p>16 said that or who told me about that but they didn't</p> <p>17 elaborate on what happened or who was even there.</p> <p>18 Q. Well, this then brings up a question, and</p> <p>19 a second ago you said that you were only aware of</p> <p>20 the excessive force that we know about. And your</p> <p>21 shift didn't even tell you about the incident that</p> <p>22 occurred a month earlier. There's no guardrails in</p> <p>23 place so that anybody in control of -- had any</p> <p>24 control over what any of these deputies are doing.</p> <p>25 Right?</p>

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<p>Page 122</p> <p>1 MR. DARE: Object to form.</p> <p>2 THE WITNESS: There's no guardrails that</p> <p>3 exist to my knowledge that can shadow a deputy 24/7</p> <p>4 while he's working. They have to have somewhat of</p> <p>5 some freedom to be able to do their job and one to</p> <p>6 two supervisors cannot be everywhere those deputies</p> <p>7 are all the time. But I'm not sure if that answers</p> <p>8 your question. But there is nothing in place to</p> <p>9 assure that they're supervised all the time.</p> <p>10 BY MR. WALKER:</p> <p>11 Q. Is it true that the Goon Squad on the 11</p> <p>12 a.m. to 11 p.m. shift because overnight misdeeds</p> <p>13 committed by the Sheriff's Department would be less</p> <p>14 visible to the public?</p> <p>15 A. No.</p> <p>16 Q. Is it true that the Rankin County</p> <p>17 Sheriff's Department had a culture that rewarded</p> <p>18 aggressiveness and the willingness to do what was</p> <p>19 needed to be done to achieve whatever goals it</p> <p>20 perceived?</p> <p>21 A. No.</p> <p>22 Q. Were you led to believe that would be no</p> <p>23 adverse consequences regarding the use of excessive</p> <p>24 force for constitutional violations?</p> <p>25 A. No.</p>	<p>Page 124</p> <p>1 things that I did, like not saying something to</p> <p>2 Dedmon when he shot that round. Why I felt the need</p> <p>3 that I had to say that I was leaving the scene when</p> <p>4 the shooting occurred. Why I felt the need to tell</p> <p>5 Elward that I had a gun. And I thought of all of</p> <p>6 that and I cannot come up with a good answer from</p> <p>7 that. Like just the -- I know that that night I</p> <p>8 just panicked and did -- made some choices that I</p> <p>9 shouldn't have made as far as like saying that about</p> <p>10 the gun or, you know, that I was leaving the scene.</p> <p>11 I'm not -- other than just sheer panic I don't know</p> <p>12 why I did that.</p> <p>13 Q. And I guess I'm asking the question</p> <p>14 because, you know, what occurred there went on for</p> <p>15 some amount of time. If they were going to just</p> <p>16 arrest Mr. Jenkins and Mr. Parker, they were in</p> <p>17 cuffs by the time you got in.</p> <p>18 A. Right.</p> <p>19 Q. You all were there for 35 to 40 minutes by</p> <p>20 your estimation after that and stuff just didn't get</p> <p>21 any better.</p> <p>22 A. Okay.</p> <p>23 Q. So over the course of that 35 to 40</p> <p>24 minutes was it peer pressure that stopped you from</p> <p>25 saying this is not right, this is not something that</p>
<p>Page 123</p> <p>1 Q. Were you a member of the HIDTA Task Force,</p> <p>2 which is something that I guess came from MBI?</p> <p>3 A. Assist HIDTA, H-I-D-T-A, yeah.</p> <p>4 Q. That didn't involve you?</p> <p>5 A. No, sir.</p> <p>6 Q. Your overtime was not paid through HIDTA?</p> <p>7 A. No.</p> <p>8 Q. Do you get overtime?</p> <p>9 A. Occasionally, yes. It was paid by Rankin</p> <p>10 County. Most of the overtime I got was just like</p> <p>11 SRT training, SRT call out.</p> <p>12 Q. How often did you all have to go out SRT?</p> <p>13 A. It was very rare.</p> <p>14 Q. Once or twice a year?</p> <p>15 A. Yeah. Maybe a little more than that but</p> <p>16 it's --</p> <p>17 Q. Let me ask you, we'll go back and almost</p> <p>18 finish. When you got out to Conerly Road and</p> <p>19 everything's clearly going off the rails, was there</p> <p>20 any sort of peer pressure or some other pressure</p> <p>21 that stopped you from doing whatever was necessary</p> <p>22 to gain control of the situation?</p> <p>23 A. There may have been. Like I thought the</p> <p>24 best answer after the fact or I thought of that</p> <p>25 question after the fact but, you know, why I did the</p>	<p>Page 125</p> <p>1 I'm normally a part of and I'm going to regain</p> <p>2 control of this situation here since, you know,</p> <p>3 several of these people are directly under my charge</p> <p>4 even if McAlpin and Dedmon are not under my charge?</p> <p>5 A. I would say possibly that peer pressure</p> <p>6 was probably part of it, the part that I was aware</p> <p>7 of and just -- but anything other than that I</p> <p>8 couldn't give, like I said, I thought about that</p> <p>9 question many times, why I reacted the way I did.</p> <p>10 Q. After January 24th, when you -- the next</p> <p>11 day you were back in your regularly scheduled</p> <p>12 duties, did you have any discussion with Sheriff</p> <p>13 Bailey or anybody else? I know you gave a statement</p> <p>14 to MBI but did you have a discussion with Sheriff</p> <p>15 Bailey or anybody else about what had occurred that</p> <p>16 night?</p> <p>17 A. I talked to -- we did a, like an IAB.</p> <p>18 Q. What's an IAB?</p> <p>19 A. Internal Affairs.</p> <p>20 Q. Okay.</p> <p>21 A. Or just say IA, with Godfrey.</p> <p>22 Q. Steven Godfrey?</p> <p>23 A. Right. And then I briefly talked with</p> <p>24 Paul Holley, who was at the FBI Academy at the time.</p> <p>25 And he just told me to be truthful. And that I</p>

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<p style="text-align: right;">Page 126</p> <p>1 would be okay. He said, man, just tell the truth of 2 what happened.</p> <p>3 Q. So and you said that you did an IAB with 4 Godfrey. What did that consist of?</p> <p>5 A. I can't remember. Just asking pretty much 6 yes and no questions. I don't remember what all 7 they were.</p> <p>8 Q. Was he trying to do more than get to the 9 basics of what went on that night?</p> <p>10 A. I don't think so. He was just trying to 11 get to the basics of what went on that night. I 12 mean, nothing more that I would -- that I picked up 13 from it. It was --</p> <p>14 Q. How long did that conversation with 15 Godfrey last?</p> <p>16 A. Fifteen to 20 minutes.</p> <p>17 Q. And you said it was mostly yes or no 18 questions?</p> <p>19 A. I don't remember. This -- maybe give him 20 a quick synopsis of what happened or on my part of 21 it.</p> <p>22 Q. And did you tell him the same story you 23 told the MBI or you told him what happened?</p> <p>24 A. No. I told him the same story I told MBI.</p> <p>25 Q. Did anybody ever ask how it was that Mr.</p>	<p style="text-align: right;">Page 128</p> <p>1 A. He was put on administrative leave.</p> <p>2 Q. Starting that next day?</p> <p>3 A. I think so.</p> <p>4 Q. What about Opdyke?</p> <p>5 A. I'm not sure when he was but he was not 6 the next day. It was later on.</p> <p>7 Q. Do you know when McAlpin went on 8 administrative leave?</p> <p>9 A. I don't.</p> <p>10 Q. And Dedmon went on desk duty or do you 11 know?</p> <p>12 A. What I heard was that Devin went on desk 13 duty but then they just told him to stay away from 14 the office all together.</p> <p>15 Q. Do you know how long it was when they told 16 him to stay away from the office all together?</p> <p>17 A. I do not.</p> <p>18 Q. Was it before you were asked to turn in 19 your truck and --</p> <p>20 A. Yes.</p> <p>21 Q. So it was pretty clear there was an 22 investigation going on and that it was widening?</p> <p>23 A. Yes.</p> <p>24 Q. And you said that you knew that there was 25 an active investigation around April?</p>
<p style="text-align: right;">Page 127</p> <p>1 Jenkins was shot in the mouth when he went for the 2 gun?</p> <p>3 A. No.</p> <p>4 Q. Nobody asked that?</p> <p>5 A. Not to my knowledge.</p> <p>6 Q. MBI didn't ask you?</p> <p>7 A. They asked me but I didn't know -- I 8 didn't -- I couldn't give an answer because I didn't 9 know what happened.</p> <p>10 Q. Okay.</p> <p>11 A. I don't know what -- I never knew what 12 Elward's story was as to how it happened.</p> <p>13 Q. How the gun got in Mr. Jenkins's mouth?</p> <p>14 A. Right. The story that they were telling.</p> <p>15 Q. You didn't know what Elward was saying?</p> <p>16 A. Right. And didn't know that night. I 17 never asked him like why did you have your gun in 18 his mouth or anything like that because now things 19 were -- I was more worried about getting Jenkins 20 medical help or whatever. It's just I had not 21 pulled him aside, like hey, why did you -- why did 22 you do that? Why did you have your gun in his mouth 23 or anything.</p> <p>24 Q. Well, was Elward taken off and put on 25 administrative leave or desk duty or what happened?</p>	<p style="text-align: right;">Page 129</p> <p>1 A. I said I can't be specific on dates but I 2 knew at some point that there was an active 3 investigation and that I was involved in that.</p> <p>4 Q. Did anybody ever come to you and tell you 5 to stick to your story?</p> <p>6 A. No. No. Not -- I mean, we -- we 7 discussed that amongst ourselves to stick to our 8 story.</p> <p>9 Q. After that night?</p> <p>10 A. Right.</p> <p>11 Q. When?</p> <p>12 A. I don't know. It was some time after that 13 night. I don't know when it was.</p> <p>14 Q. That this is what we're saying. This is 15 what we're saying happened. This is what we're 16 going to stick with to the very end?</p> <p>17 A. And that was before -- yes. And that was 18 before the MBI investigation or whatever, the 19 interview.</p> <p>20 Q. Now, MBI was going to interview any 21 shooting that occurred within the department anyway. 22 Right?</p> <p>23 A. Right.</p> <p>24 Q. And they asked -- you first spoke to MBI 25 the next day or sometime later?</p>

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<p style="text-align: right;">Page 130</p> <p>1 A. No. It was sometime later.</p> <p>2 Q. Okay. And the story you told me today</p> <p>3 that you told them, that's what you told them then?</p> <p>4 A. Right. About that I was in my truck</p> <p>5 backing out and heard them call for medical. And I</p> <p>6 come back and that's when I -- everything before</p> <p>7 that and after that is the truth. The only part</p> <p>8 that I guess you can say lied about was that I was</p> <p>9 in my truck leaving whenever I heard them call for</p> <p>10 medical and I'd come back.</p> <p>11 MR. WALKER: I tender the witness.</p> <p>12 EXAMINATION</p> <p>13 BY MR. DARE:</p> <p>14 Q. Mr. Middleton, you also did an incident</p> <p>15 report or something in relation to the events that</p> <p>16 occurred on January 24, 2023, did you not?</p> <p>17 A. Yes, sir.</p> <p>18 Q. As a lieutenant, did you also have an</p> <p>19 opportunity to review Hunter Elward and Daniel</p> <p>20 Opdyke's incident or supplemental reports?</p> <p>21 A. I had an opportunity but I did not</p> <p>22 Q. Your report that you did for the Sheriff's</p> <p>23 Department contained falsities as well, did it not?</p> <p>24 A. It did.</p> <p>25 Q. You would agree with me that it's fairly</p>	<p style="text-align: right;">Page 132</p> <p>1 A. No. I don't think I ever heard that phone</p> <p>2 call. I don't remember who -- somebody else had</p> <p>3 heard it and told me about it.</p> <p>4 Q. So and as you sit here today, do you know</p> <p>5 if that phone call even exists?</p> <p>6 A. I couldn't say for sure that it does.</p> <p>7 Q. Other than being animated against dealings</p> <p>8 with a female the time prior, had you witnessed any</p> <p>9 other -- witnessed personally firsthand any other</p> <p>10 violence committed by Christian Dedmon? I'm not</p> <p>11 referring to what you heard.</p> <p>12 A. Right.</p> <p>13 Q. I'm referring only to what you saw with</p> <p>14 your own two eyes.</p> <p>15 A. No.</p> <p>16 Q. I'm going to show you what is Bates</p> <p>17 stamped RC2053. I'm going to show it to Mr. Walker</p> <p>18 first.</p> <p>19 Since the court reporter is here I'm just</p> <p>20 going to refer to it by the Bates number at the very</p> <p>21 bottom.</p> <p>22 What is that document?</p> <p>23 A. Okay. It's a use of force in vehicle</p> <p>24 pursuit?</p> <p>25 Q. Yeah. Why are all of these folks named on</p>
<p style="text-align: right;">Page 131</p> <p>1 difficult for anybody above you, whether that be the</p> <p>2 chief deputy, the undersheriff, or the sheriff to</p> <p>3 know exactly what's going on when there's falsities</p> <p>4 in reports. Correct?</p> <p>5 A. I would -- that's a possibility. I mean,</p> <p>6 but there again, it's hard to say a yes or a no. I</p> <p>7 mean --</p> <p>8 Q. It certainly makes it a whole lot more</p> <p>9 difficult to know what's going on -- well, you as a</p> <p>10 supervisor, when you review a report, you assume</p> <p>11 that the deputies underneath you are being truthful</p> <p>12 and honest, do you not?</p> <p>13 A. That's right.</p> <p>14 Q. You testified a little bit about what was</p> <p>15 going on in December of '22 on the side of the</p> <p>16 highway or the side of the interstate with the Alan</p> <p>17 Schmidt incident. Were you out there at all?</p> <p>18 A. No.</p> <p>19 Q. Do you have any personal firsthand</p> <p>20 knowledge of anything that occurred on the side of</p> <p>21 the interstate?</p> <p>22 A. No. Not until this allegations come up</p> <p>23 against them other than the phone call from the</p> <p>24 jail, you know, I would say --</p> <p>25 Q. Did you listen to that phone call?</p>	<p style="text-align: right;">Page 133</p> <p>1 this use of force in vehicle pursuit page?</p> <p>2 A. I'm assuming because they were all maybe</p> <p>3 either there or involved in this pursuit.</p> <p>4 Q. Is that a --</p> <p>5 A. I guess if I could have brought the whole</p> <p>6 thing in --</p> <p>7 Q. When you had training at the Sheriff's</p> <p>8 Department, did you have sign-up sheets?</p> <p>9 A. No.</p> <p>10 Q. Nothing similar to this?</p> <p>11 A. No. Like training and stuff?</p> <p>12 Q. Sure. If you were retrained on use of</p> <p>13 force in vehicle --</p> <p>14 A. Oh, sure, sure. Yeah, sure. We would</p> <p>15 sign a sign-in sheet or something like that. Right.</p> <p>16 Q. To prove that you had actually gone</p> <p>17 through that training.</p> <p>18 A. Right.</p> <p>19 Q. Who is Richard Lawrence?</p> <p>20 A. Legal counsel.</p> <p>21 Q. Was he legal counsel in 2019?</p> <p>22 A. I believe he was.</p> <p>23 Q. Can you -- when asked a bunch of questions</p> <p>24 about, and specifically, in reference to the request</p> <p>25 for admissions that were sent to you earlier. Some</p>

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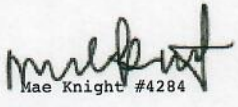
134 to 137

<p style="text-align: right;">Page 134</p> <p>1 of the questions verbatim were based on requests for 2 admissions. You did respond to the request for 3 admissions, did you not? 4 A. I did. 5 Q. And you denied for the most part all of 6 the requests for admissions. Is that right? 7 A. I'm not sure I understand. But I just 8 want to make sure I know what I'm answering to. I 9 mean -- 10 Q. Sure. For instance, you were asked in the 11 request for admission to admit the admission of the 12 Goon Squad and its coin logo was well known to 13 personnel at all levels in the Rankin County 14 Sheriff's Department including Sheriff Bailey. 15 Your response was, "Admit that the coin 16 existed but deny that there was a Goon Squad other 17 than the nickname for the shift I was on and deny 18 the rest as I don't know what anyone knew." 19 One, was that your response to Request for 20 Admission No. 1? 21 A. Yes. 22 Q. And based on the totality of everything 23 that you've testified hereto today is that still 24 accurate? 25 A. Yes.</p>	<p style="text-align: right;">Page 136</p> <p>1 Q. If they wanted to? 2 A. I would say yes. Yes. 3 Q. They were citizens of the United States 4 and as long as it was lawful to buy ammunition they 5 could go out and buy ammunition. Correct? 6 A. Yes. 7 Q. Had you ever made any misrepresentations 8 of any other incident report or reports you did for 9 the Sheriff's Department other than on this one 10 instance? 11 A. No. 12 Q. And are you aware as we sit here today of 13 any other misrepresentations by any of the deputies 14 working underneath you made, for instance, prior to 15 this one, the January 24, 2023, incident? 16 A. No. 17 Q. You don't know specifically what the 18 sheriff would had done had you spoken with him about 19 your beliefs on Dedmon, do you? 20 A. I couldn't say for sure. 21 Q. And you never did have that conversation 22 with the sheriff about your beliefs about Dedmon, 23 did you? 24 A. No. 25 Q. This is Bates stamped RC168.</p>
<p style="text-align: right;">Page 135</p> <p>1 Q. When you were working in the jail at the 2 Sheriff's Department were you made aware that there 3 was a -- there were medical personnel that also 4 worked at the jail? 5 A. Yes. 6 Q. And as part of the duties of the medical 7 personnel would they do assessments on individuals 8 within a certain timeframe of being booked in, if 9 you know? 10 A. I don't -- I don't know what their -- what 11 their requirements -- what the medical personnel -- 12 what their SOPs were, what their requirements were. 13 I don't know. 14 THE REPORTER: Attorney Dare, would you 15 like to mark Bates RC2053 as Exhibit 1? 16 MR. DARE: No, thank you. 17 THE REPORTER: Thank you, sir. 18 BY MR. DARE: 19 Q. You were asked a question about inventory 20 on ammunition. Were deputies or any personnel with 21 the Sheriff's Department free to buy their own 22 ammunition from whether it be Vans or from anywhere 23 at any time they choose? Could they? 24 A. So could any of the deputies go buy 25 ammunition from Vans if they wanted to?</p>	<p style="text-align: right;">Page 137</p> <p>1 What is that document? 2 A. Board of -- Board on Law Enforcement 3 Officers Standard and Training, professional 4 certificate to me, Jeffrey Alwood Middleton. 5 Q. Issued by the State of Mississippi. Is 6 that right? 7 A. Issued by the State of Mississippi. 8 Q. Held by the Rankin County Sheriff's 9 Department up until the time of your termination. 10 Is that right? 11 A. Right. I guess they -- I don't know when 12 they got rid of it but -- or whatever, you know. 13 Q. So at all points in time when you were 14 working with the Rankin County Sheriff's Department, 15 you were certified through the State of Mississippi 16 to do so. Correct? 17 A. Correct. 18 MR. DARE: Let's take five minutes so that 19 you can go through your stuff and I can go through 20 my stuff. 21 MR. WALKER: That's fine. 22 MR. DARE: We're going to go off the 23 record for about five minutes. 24 THE VIDEOGRAPHER: Okay. Please stand by. 25 The time is 1:31 p.m. and we are off the record.</p>

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<p style="text-align: right;">Page 138</p> <p>1 (WHEREUPON, a recess was taken.)</p> <p>2 THE VIDEOGRAPHER: We are on the record.</p> <p>3 The time is 1:35 p.m.</p> <p>4 You may now proceed.</p> <p>5 MR. DARE: Thank you for your indulgence.</p> <p>6 I tender the witness at this time.</p> <p>7 MR. WALKER: No further questions.</p> <p>8 MR. DARE: Mr. Leland, would you like to</p> <p>9 ask any questions?</p> <p>10 MR. LELAND: I don't have any questions.</p> <p>11 MR. DARE: Thank you.</p> <p>12 THE VIDEOGRAPHER: Okay. All right.</p> <p>13 Perfect.</p> <p>14 Before we go off the record, counsel, our</p> <p>15 court reporter will take orders for the transcript</p> <p>16 and I will take orders for the video.</p> <p>17 THE REPORTER: Thank you.</p> <p>18 Attorney Walker, would you like to order</p> <p>19 the original transcript, sir?</p> <p>20 MR. WALKER: Yes.</p> <p>21 THE REPORTER: Thank you, sir.</p> <p>22 And Attorney Leland, would you like to</p> <p>23 order a copy of the transcript?</p> <p>24 MR. LELAND: Transcript.</p> <p>25 THE REPORTER: You would like a copy, sir?</p>	<p style="text-align: right;">Page 140</p> <p style="text-align: center;">CERTIFICATE</p> <p>1</p> <p>2</p> <p>3 I, the undersigned, Vincent Guerrero, am a</p> <p>4 videographer on behalf of NAEGELI Deposition &</p> <p>5 Trial. I do hereby certify that I have accurately</p> <p>6 made the video recording of the deposition of</p> <p>7 Jefferey Middleton, in the above captioned matter on</p> <p>8 the 14th day of March, 2025, taken at the location</p> <p>9 of FCI McKean, 6975 PA-59, Lewis Run, PA 16738.</p> <p>10</p> <p>11 No alterations, additions, or deletions were</p> <p>12 made thereto.</p> <p>13</p> <p>14 I further certify that I am not related to any</p> <p>15 of these parties in the matter and I have no</p> <p>16 financial interest in the outcome of this matter.</p> <p>17</p> <p>18 </p> <p>19 Vincent Guerrero</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 139</p> <p>1 MR. LELAND: Yes.</p> <p>2 THE REPORTER: Thank you, sir.</p> <p>3 And Attorney Dare, would you like a copy</p> <p>4 of the transcript?</p> <p>5 MR. DARE: Electronic only, please.</p> <p>6 THE REPORTER: Electronic only. Thank</p> <p>7 you.</p> <p>8 THE VIDEOGRAPHER: And counsel --</p> <p>9 MR. LELAND: And that would be electronic</p> <p>10 copy for me, also.</p> <p>11 THE REPORTER: Only electronic for you</p> <p>12 also, Mr. Leland.</p> <p>13 MR. LELAND: Yes.</p> <p>14 THE REPORTER: Thank you.</p> <p>15 MR. LELAND: Just electronic.</p> <p>16 THE VIDEOGRAPHER: And counsel, Mr.</p> <p>17 Shabazz will be getting today's video included in</p> <p>18 his appearance fee. Would anyone like a copy of</p> <p>19 today's video deposition?</p> <p>20 MR. WALKER: No. Mr. Shabazz --</p> <p>21 MR. SHABAZZ: No.</p> <p>22 THE VIDEOGRAPHER: Okay. All right. The</p> <p>23 time is 1:36 p.m. and we are off the record.</p> <p>24 (WHEREUPON, the deposition of JEFFREY</p> <p>25 MIDDLETON concluded at 1:36 p.m.)</p>	<p style="text-align: right;">Page 141</p> <p style="text-align: center;">CERTIFICATE</p> <p>1</p> <p>2</p> <p>3 I, Mae Knight, do hereby certify that I</p> <p>4 reported all proceedings adduced in the foregoing</p> <p>5 matter and that the foregoing transcript pages</p> <p>6 constitutes a full, true and accurate record of said</p> <p>7 proceedings to the best of my ability.</p> <p>8</p> <p>9 I further certify that I am neither related to</p> <p>10 counsel or any party to the proceedings nor have any</p> <p>11 interest in the outcome of the proceedings.</p> <p>12</p> <p>13 IN WITNESS WHEREOF, I have hereunto set my hand</p> <p>14 this 21st day of March, 2025.</p> <p>15</p> <p>16</p> <p>17 </p> <p>18 Mae Knight #4284</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1			1		
2	Deposition of: Jeffrey Middleton Date: 03/14/25		2	Deposition of: Jeffrey Middleton Date: 03/14/2025	
3	Regarding: Jenkins vs. Rankin County, Mississippi		3	Regarding: MICHAEL JENKINS vs . RANKIN COUNTY, MISSISSIPPI	
4	Reporter: Knight/Morrison		4	Reporter: Mae Knight	
5			5		
6	Please make all corrections, changes or		6		
7	clarifications to your testimony on this sheet,		7	I declare under penalty of perjury the following to be	
8	showing page and line number. If there are no		8	true:	
9	changes, write "none" across the page. Sign this		9		
10	sheet and the line provided.		10	I have read my deposition and the same is true and	
11	Page Line Reason for Change		11	accurate save and except for any corrections as made	
12	_____		12	by me on the Correction Sheet herein.	
13	_____		13		
14	_____		14	Signed at _____, _____	
15	_____		15	on the _____ day of _____, 20____.	
16	_____		16		
17	_____		17		
18	_____		18		
19	_____		19		
20	_____		20		
21	_____		21		
22	_____		22		
23	_____		23		
24	Signature: _____		24	Signature: _____	
25	Jeffrey Middleton		25	Jeffrey Middleton	

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2	Deponent: Jeffrey Middleton
3	Case: MICHAEL JENKINS vs . RANKIN COUNTY, MISSISSIPPI
4	
5	ATTORNEY - TRANSCRIPT ENCLOSED:
6	signature of your client is required. Please have your client
7	make any corrections necessary. Sign the Correction Sheet
8	where indicated. Forward a COPY of the executed Correction
9	Sheet directly to the attorney(s) listed below. (The Address(es)
10	can be found on the Appearance page of the deposition.) Also,
11	send a COPY of the executed Correction Sheet to our corporation.
12	
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